

FILED

JAN 17 2019

ANGIE SPARKS, Clerk of District Court
By Angie Sparks, Deputy Clerk

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Attorneys for Plaintiff

MONTANA FIRST JUDICIAL DISTRICT COURT, LEWIS & CLARK COUNTY

NATHAN SHOWALTER,

Plaintiff,

v.

LOWE'S HOME CENTERS, LLC, a North
Carolina Corporation and , a foreign
corporation d/b/a LOWE'S COMPANIES,
INC., TOM SMITH, and DOES and
ROES 1-5,

Defendant.

Cause No.

DDV 2019 52

CW-19-27-H-SEH

COMPLAINT AND DEMAND FOR
JURY TRIAL

pd ✓ (6)

Plaintiff for his complaint alleges the following:

I

All acts and omissions occurred within Lewis & Clark County, State of Montana.

II

Lowe's Home Centers, LLC and its d/b/a's (hereinafter referred to as Lowe's)

Companies, Inc., owns and operates a business establishment commonly called Lowes which has
a hardware and home improvement store in Helena, Montana.

III

Plaintiff was hired by Lowe's as a department manager when the store opened in November, 2006. Plaintiff quickly moved up with Lowe's the company in different departments and then became the assistant manager of Zone 1. After a few years he was promoted to administrative assistant manager. Throughout the time of his work for Lowes he worked and filled in for other manager as well as doing his own job. At all times he received good ratings on his evaluations and received the yearly raise. Plaintiff was the administrative assistant manager when he was terminated from his employment in July, 2018. He performed his owrkl well and was well regarded by all employees. Defendant Lowe's and Loe's Corporation are related companies and operate a Lowe's Home Center business in Helena Montana. Tom Smith was its manager at the Helena Montana store.

IV

Defendants did terminate Plaintiff from his employment with Lowe's effective 07/25/2108. Such termination was wrongful. Plaintiff is entitled to all damages for his wrongful discharge. Indeed, Defendants offered Plaintiff money and other benefits under a document called a release and separation agreement provided he not work for a related business in the Helena area for a significant period of time. Plaintiff was entitled to this severance money and other monies under the Wrongful Discharge from Employment Act and claims all of those monies herein.

V.

Plaintiff reserves the righut to amend this Complaint if discovery shows there are additional causes of action.

WHEREFORE Plaintiff prays for such damages as are proved just and proper and such other and further relief as the Court deems lawful and proper at trial.

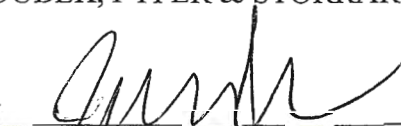
DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial of all his issues herein.

DATED this 10 day of January, 2019.

DOUBEK, PYFER & STORRAR PC

By



John Doubek

Attorney for Plaintiff